RECEIVED	IN THE UNITED STATES	DISTRICT COURT	
2005 MAY 26 P 14: 01	FOR THE MIDDLE DISTR NORTHERN D		
DEBRA P. HACKETT, CL U.S. DISTRICT COURT MITTENETUS BRURDEUA	_		
Plaint	iff,		
v.)	CASE NO .: 2:05 cr4	99-DRB
BANK ONE, N.A., e	t al.,		
Defen	dants.)		

SPECIAL APPEARANCE TO JOIN IN REMOVAL

Defendant Keith Mixon hereby makes a special appearance to join in the Notice of Removal filed in this action by Defendant Chase Bank USA, N.A., formerly known as Bank One, N.A., ("Chase") and further consents to the removal of the above-styled action to this court.

This Notice of Joinder in Removal is without waiver of any defenses, including but not limited to insufficiency of process, insufficiency of service of process, lack of personal jurisdiction, lack of subject matter jurisdiction, and failure to state a claim upon which relief can be granted. Specifically, on behalf of Keith Mixon, the undersigned counsel submit that this action is due to be dismissed pursuant to Rule 12(b). Mr. Mixon is a resident of Live Oak, Florida, and has had no contact with the State of Alabama. Accordingly, Mr. Mixon does not have the minimum contacts necessary to give rise to personal jurisdiction by the Alabama courts and has not subjected himself to service of process in Alabama. Accordingly, process and service of process on Mr. Mixon in the state court action was improper and insufficient, and the Alabama courts lack jurisdiction over Mr. Mixon.

Herman Cobb (COB004) Leon A. Boyd, V (BOY035)

One of the Attorneys for Defendant Keith Mixon

CERTIFICATE OF SERVICE

I hereby certify that I have served the above and foregoing upon the following counsel of record by placing a copy of same in the United States mail, properly addressed and postage prepaid, on this the 26th day of May, 2005:

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Of Counsel